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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

STEPHAN CAMPBELL, *on behalf of*
himself and all others similarly situated,

Plaintiff,

v.

EVERYTHING BREAKS, INC.,

Defendant.

Case No.: 2:23-cv-00861-GMN-EJY

**JOINT NOTICE OF PENDING
SETTLEMENT AND
JOINT MOTION FOR STAY OF
DISCOVERY DEADLINES AND
DEADLINES ORDERED BY THE
COURT IN ITS JULY 30, 2024,
HEARING**

**TO THE COURT, EACH PARTY AND THEIR ATTORNEY OF
RECORD:**

Plaintiff Stephan Campbell (“Plaintiff”), individually and as representative of a proposed Settlement Class and Defendant Everything Breaks, Inc. (collectively referred to as the “Parties”), by and through their attorneys of record, notify the Court that the Parties have reached an agreement in principle to fully, finally, and forever resolve, discharge, and release all rights and claims in, or that could have been asserted in, the above-referenced class action, subject to a mutually acceptable settlement agreement, preliminary and final approval of the class settlement, and dismissal of the action with prejudice by the Court. The Parties are presently memorializing the class settlement in a comprehensive settlement agreement and related documents, which the Parties will endeavor to file with the Court as part of a motion for preliminary approval within forty-five (45) days of this Joint Notice.

The Parties further move the Court for entry of an Order staying the discovery deadlines and all deadlines ordered by the Court in its July 30, 2024, hearing for forty-five (45) days while the Parties finalize the class action settlement and related documents, including the aforementioned motion for preliminary approval. As grounds and good cause therefor, the Parties state that:

1. The Parties have reached a proposed class settlement. The proposed class settlement will fully, finally, and forever resolve, discharge, and release all rights and claims in, or that could have been asserted in, the above-referenced action.
2. The Parties are presently memorializing the class settlement in a comprehensive settlement agreement and related documents, which the Parties will endeavor to file with the Court as part of a motion for preliminary approval within forty-five (45) days of this Joint Motion for Stay of Proceedings.

1 WHEREFORE, Plaintiff and Defendant respectfully request that this Court
2 stay proceedings for forty-five (45) days while the Parties finalize the class
3 settlement agreement and related documents.

4
5 Dated: August 6, 2024

Respectfully submitted,

6 /s/ Chris R. Miltenberger

7 Chris R. Miltenberger, Esquire

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Attorneys for Defendant,
EVERYTHING BREAKS, INC.

CERTIFICATE OF SERVICE

I certify that on the date below I electronically filed the foregoing document and that it is available for viewing and downloading from the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

BY: /s/ Chris R. Miltenberger
Chris R. Miltenberger